

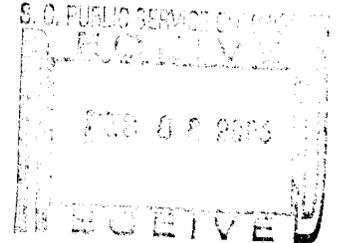
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February 3, 2006

The Honorable Charles L. A. Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, S.C. 29211

Re: Docket No. 2005-354-A (Proposed Changes to Article 8 Regulations)

Dear Mr. Terreni:

As an attorney who represents several entities before the Public Service Commission of South Carolina, I respectfully submit these comments in regards to the proposed revisions to Article 103-881, revised as 103-54.

Under 103-881, Petition for Rehearing or Reconsideration, Section B provides for a 20 day time limit after receipt of an Order to file for a rehearing or reconsideration "Except as otherwise provided by S.C. Code Ann., Section 58-5-330, 58-9-1200, 58-11-550, 58-27-2150 (1976)." For telecommunications and electric utilities and cooperatives, 10 days are allowed for filing; 20 days are allowed for gas, heat and water companies.

The fact that different sections of the S.C. Code and the Commissions regulations provide different timeframes in which to file Petitions for Rehearing is confusing. Uniformity in time limits for filing legal documents at the Commission is requested, to assist practitioners who appear before the agency.

I understand that changes in these Regulations cannot accomplish uniformity, and changes in the statutes are required. I encourage the Commission to seek repeal or amendment of pertinent code sections to allow for increased efficiency in practice and procedure before the Commission.

Thank you for the opportunity to submit these suggestions.

Very truly yours,

WOODWARD, COTHRAN & HERNDON

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